

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

BRENDA L. LUCERO, HEATHER BARTON,
ILONA KOMPANIETS and CYNTHIA
HURTADO, individually and on behalf of all
others similarly situated,

Plaintiffs,

V.

CIVIL ACTION NO.: 3:22-cv-00208-jdp

CREDIT UNION RETIREMENT PLAN)
ASSOCIATION, THE BOARD OF DIRECTORS)
OF THE CREDIT UNION RETIREMENT PLAN)
ASSOCIATION, THE BOARD OF TRUSTEES)
OF RETIREMENT PLANS, THE PLAN)
ADMINISTRATIVE COMMITTEE, and JOHN)
DOES 1-30.)

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT, GRANTING CLASS CERTIFICATION FOR SETTLEMENT
PURPOSES, APPROVING FORM AND MANNER OF SETTLEMENT NOTICE,
PRELIMINARILY APPROVING PLAN OF ALLOCATION, AND
SCHEDULING A DATE FOR A FAIRNESS HEARING**

Plaintiffs, Brenda L. Lucero, Heather Barton, Ilona Kompaniets, and Cynthia Hurtado, (together, “Plaintiffs”), respectfully submit this Unopposed Motion for Preliminary Approval of Class Action Settlement entered into with Defendants,¹ (“Motion for Preliminary Approval”) and respectfully move the Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted herewith.

¹ Defendants refer to Credit Union Retirement Plan Association, the Board of Directors of the Credit Union Retirement Plan Association, the Board of Trustees of Retirement Plans, and the Plan Administration Committee (collectively, “Defendants”)

A Proposed Order is submitted herewith.

Dated: August 16, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/Mark K. Gyandoh

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(admitted *pro hac vice*)

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*Attorneys for Plaintiffs, the Plan
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2024, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Mark K. Gyandoh
Mark K. Gyandoh